



Iowa Department of Human Services

INFORMATIONAL LETTER NO.1928-MC-FFS-D

DATE: August 14, 2018

TO: All Iowa Medicaid Providers (Excluding Individual Consumer-Directed Attendant Care (CDAC) Providers)

APPLIES TO: Managed Care (MC), Fee-for-Service (FFS) and Dental (D)

FROM: Iowa Department of Human Services (DHS), Iowa Medicaid Enterprise (IME)

RE: Ordering, Prescribing, or Referring Practitioners

EFFECTIVE: Immediately

****This Letter Replaces Informational Letter No. 1913-MC-FFS-D issued on June 15, 2018****

The Affordable Care Act (ACA) requires physicians or other eligible practitioners to enroll in the Medicaid program to order, prescribe, refer items or services for Medicaid beneficiaries; even when they do not submit claims to Medicaid. Any independent practitioner rendering Medicaid covered benefits must be enrolled with the IME, including attending providers.

The ACA requires ordering, prescribing, or referring providers to enroll only to meet ACA program integrity requirements. This requirement is designed to ensure all orders, prescriptions or referrals for items or services for Medicaid beneficiaries originates from appropriately licensed practitioners who have not been excluded from Medicare or Medicaid.

The IME may not pay claims, and may later recoup claims if the service or product has been requested by a provider who is not enrolled with the IME. In addition to being enrolled with the IME, billing providers are required to include the National Provider Identifier (NPI) of any ordering, prescribing, or referring provider as detailed in Federal Regulations (42 CFR 455.410) when submitting the claim. If you are already enrolled as an IME provider, you do not need to enroll as an ordering, prescribing, or referring provider. If you are enrolling as an ordering, prescribing, or referring provider, you must have an NPI. The NPI is the standard, unique health identifier for healthcare providers and is assigned by the National Plan and Provider Enumeration System (NPPES).

Practitioners eligible to enroll with the IME as an ordering, prescribing, or referring provider are listed below:

- Licensed Doctors of Medicine/Osteopathy
- Licensed Doctors of Chiropractic
- Licensed Doctors of Dental Medicine/Surgery
- Licensed Doctors of Podiatric Medicine
- Licensed Doctors of Optometry
- Opticians
- Licensed Physical Therapists
- Licensed Audiologists
- Licensed Physician Assistants
- Licensed Nurse Practitioners

- Certified Registered Nurse Anesthetist
- Licensed Certified Nurse Midwives
- Licensed Clinical Psychologists
- Licensed Clinical Social Worker

Applying for an NPI is a process separate from enrolling with the IME. To obtain an NPI, [apply online](#)¹.

Ordering, prescribing, or referring providers:

- Are not required to pay application fees.
- Are required to revalidate their enrollment every five years.
- Are subject to federal/state screening requirements.
- Cannot submit claims to the IME for payment for services rendered. To submit claims, you must complete the [Iowa Medicaid Universal Provider Enrollment Application](#)² for your provider type and/or specialty.
 - Opioid treatment centers that do not intend to submit claims for reimbursement should enroll as ordering, prescribing, or referring providers.
 - Providers who are required to enroll as an ordering, prescribing, or referring provider for Medicare, must also enroll with the IME in order to order, prescribe or refer Medicaid members for services.

Federal Regulations (42 CFR 455.410) require the enrollment of all non-billing physicians and practitioners. Providers who enroll as non-billing entities are enrolling for the sole purpose of ordering or prescribing services or items for use by Medicaid members or referring members to another provider. The regulation also requires the inclusion of the ordering/referring provider name and NPI on the billing provider's claim for reimbursement.

Billing providers who must report the name and NPI of an enrolled ordering, prescribing, or referring provider on the Medicaid claim includes but is not limited to:

- Durable Medical Equipment Suppliers
- Home Health Agencies
- Orthopedic Shoe Dealers
- Hearing Aid Dealers
- Hospice
- Hospitals (inpatient and outpatient)
- Mental Hospitals
- Imaging\Testing Facilities
- Independent Laboratories
- All Facility Types[Nursing Facility (NF), Nursing Facility for Persons with Mental Illness (NF/MI), Skilled Nursing Facility (SNF), Intermediate Care Facility for the Intellectually Disabled (ICF/ID), Psychiatric Medical Institution for Children (PMIC)]
- Clinics/Outpatient Health Facilities
- Pharmacies
- Portable X-Ray Suppliers
- Private Duty Nurses
- Rehabilitation Agencies
- Occupational Therapists

¹ <https://npiregistry.cms.hhs.gov/>

² <https://dhs.iowa.gov/sites/default/files/470-0254.pdf>

- Physical Therapists
- Speech Language Pathologists

Providers Enrolled as an Organization:

Community Mental Health Clinics (CMHCs), Behavioral Health Service organizations, Behavioral Health Intervention Service (BHIS) organizations, Rehabilitation Agencies, Federally Qualified Health Clinics (FQHCs), PMICs, Rural Health Clinics (RHCs), and Indian Health Services (IHS) bill for Medicaid covered services using the organization's NPI. Employees of these organizations that order, prescribe or refer Medicaid covered services **must** enroll individually with the IME.

Employees of organizations listed above that render Medicaid covered services on behalf of the organization but do not order, prescribe or refer services do not need to enroll individually with the IME. The organization bills for services using the organization's NPI as the billing provider and the rendering provider ID on the claim. These employees may include:

- Provisionally licensed Psychologists
- Temporarily licensed and licensed Mental Health Counselors (LMHC)
- Certified Alcohol and Drug Addiction Counselors
- Board Certified Behavior Analysts
- Registered Nurse Practitioners

Please refer to the following Informational Letters for additional provider specific guidance.

[Informational Letter 1832-MC-FFS³](#)

[Informational Letter 1755-D⁴](#)

[Informational Letter 1596⁵](#)

[Informational Letter 1564⁶](#)

[Informational Letter 1508⁷](#)

[Informational Letter 1416⁸](#)

[Informational Letter 1330⁹](#)

If you have any questions, please contact the IME Provider Services Unit at 1-800-338-7909, or by email at imeproviderservices@dhs.state.ia.us.

³ https://dhs.iowa.gov/sites/default/files/1832-MC-FFS_Clarification_Referring_Provider_ERVisits.pdf

⁴ https://dhs.iowa.gov/sites/default/files/1755-D_Ordering_Referring_Prescribing_ORP.pdf

⁵ [https://dhs.iowa.gov/sites/default/files/1596-FinalReminderAllOrderingPrescribingReferringProvidersMust be Enrolled with IowaMedicaid.pdf](https://dhs.iowa.gov/sites/default/files/1596-FinalReminderAllOrderingPrescribingReferringProvidersMust%20be%20Enrolled%20with%20IowaMedicaid.pdf)

⁶ [https://dhs.iowa.gov/sites/default/files/1564_Reminder_All%20Ordering_Prescribing_Referring_Providers_Must -%20be Enrolled with-IowaMedicaid.pdf](https://dhs.iowa.gov/sites/default/files/1564_Reminder_All%20Ordering_Prescribing_Referring_Providers_Must%20be%20Enrolled%20with-IowaMedicaid.pdf)

⁷ https://dhs.iowa.gov/sites/default/files/1508_Referring%20or%20Presc_Prov_%20Req_for_Pres_Meds_Delayed.pdf

⁸ [https://dhs.iowa.gov/sites/default/files/1416_Referring_or_Prescribing_Providers_Must Be Enrolled With Iowa Medicaid.pdf](https://dhs.iowa.gov/sites/default/files/1416_Referring_or_Prescribing_Providers_Must_Be_Enrolled_With_Iowa_Medicaid.pdf)

⁹ <http://dhs.iowa.gov/sites/default/files/1330%20Referring%20or%20Prescribing%20Providers%20Must%20be%20Enrolled%20with%20Medicaid.pdf>